

## REMARKS

Applicants respectfully request reconsideration of this application and the Final Office Action mailed March 2, 2009. Applicants believe that no fees are due in connection with filing this response. However, if fees are due that are not accounted for in these papers, the Commissioner is authorized to debit our Deposit Account No. 19-0733 for any fees necessary to maintain the pending status of this application.

Upon entry of this Amendment, claims 21, 23, 25-35, and 37-43 will be pending in this Application. Claims 21, 23, 25-35, 37-41, and 43 have been amended. Claim 36 has been canceled.

***I. The Office's Rejection under 35 U.S.C. § 103 Based on Marinelli in view of Heitzman and Further in View of Pejas***

In the Office Action mailed March 2, 2009, the Office rejected claims 21, 27-31, 35, 37, 38-41, and 43 under 35 U.S.C. § 103 as allegedly being unpatentable over Marinelli, U.S. Patent No. 6,148,271 ("Marinelli"), in view of Heitzman, et al., U.S. Patent No. 4,716,458 ("Heitzman"), and further in view of Pejas, et al., U.S. Patent No. 5,696,481 ("Pejas"). Applicants respectfully traverse the rejection and request reconsideration of the claims, as amended.

Each of Applicants' independent claims recite a system or method that comprises a camera for capturing images. The camera is either attached to, detachably engaged with, or coupled to a vehicle attached to the mobile participant participating in a competitive event, as recited in Applicants' independent claims 21, 35, and 39, respectively. For example, the camera in the event system recited in Applicants' independent claim 21, as amended, is "for attachment to a vehicle that is attached to the mobile participants." Similarly, the camera in the system recited in Applicants' independent claim 35, as amended is "detachably engaged with a vehicle that is

attached to the mobile participant.” Also in similar fashion, the camera in the method recited in Applicants’ independent claim 39, as amended, is “coupled to a vehicle attached to the mobile participant.”

In contrast, Marinelli describes a device for measuring a moving object. Pejas describes a system for processing times at various points along a route in a sporting event. Neither of these references describes a camera or even mentions a camera. The Office relied on Heitzman to describe a camera, as claimed. However, the camera in Heitzman is “positioned in a vehicle under test behind the driver at a location where the driver’s view through the front windshield, together with the position of the steering wheel as operated by the driver...” *See* Heitzman, Col. 4, Lines 11-19. The vehicle in the Heitzman system is not attached to the mobile participant, as recited in Applicants’ independent claim 21, 35, and 39. Marinelli, Heitzman, and Pejas do not teach or suggest the camera arrangement that is recited in Applicants’ independent claims 21, 35, and 39. Thus, Marinelli, Heitzman, and Pejas, either alone or in combination do not render unpatentable Applicants’ independent claims 21, 35, and 39 or their respective dependent claims 27-31, 37, 38, 40, 41, and 43. Applicants respectfully request that the Office withdraw the rejection of claims 21, 27-31, 35, 37, 38-41, and 43 for at least these reasons. Allowance of these claims is earnestly solicited.

***II. The Office’s Rejection under 35 U.S.C. § 103 Based on Marinelli in View of Heitzman and Pejas and Further in View of Jones***

In the Office Action mailed March 2, 2009, the Office rejected claims 36 and 42 under 35 U.S.C. § 103 as allegedly being unpatentable over Marinelli in view of Heitzman and Pejas, and further in view of Jones, U.S. Patent No. 6,292,213 (“Jones”). Applicants respectfully traverse the

rejection and request reconsideration of the claims, as amended. Claim 36 is canceled, which renders its rejection moot.

As described above, Marinelli in view of Heitzman and Pejas do not recite the camera arrangement recited in Applicants' independent claim 39, as amended. Jones does not cure this deficiency. Rather, Jones describes a video camera for use during sporting events that is attached to the user's head. The Jones camera is not attached to any vehicle. Therefore, Marinelli in view of Heitzman and Pejas and further in view of Jones do not teach or suggest each element of the camera arrangement that is recited in Applicants' independent claim 39 or its dependent claim 42. Applicants respectfully request that the Office withdraw the rejection of Applicants' dependent claim 42 and earnestly solicit allowance of the same.

***III. The Office's Rejection under 35 U.S.C. § 103 Based on Marinelli in View of Pejas and Further in View of Boyd***

In the Office Action mailed March 2, 2009, the Office rejected claim 23 under 35 U.S.C. § 103 as allegedly being unpatentable over Marinelli in view of Pejas, and further in view of Boyd, et al., U.S. Patent No. 5,023,727 ("Boyd"). Applicants respectfully traverse the rejection and request reconsideration of the claim, as amended.

As described above, Marinelli in view of Pejas do not recite the camera arrangement claimed in Applicants' independent claim 21, as amended. Boyd does not cure this deficiency and the Office does not rely on it to do so. Rather, Boyd describes a system for producing a substantially continuous signal. Boyd does not even mention a camera. Thus, Marinelli, in view of Pejas and further in view of Boyd do not teach or suggest the camera arrangement, as recited in Applicants' independent claim 21 or its corresponding dependent claim 23. Applicants

respectfully request that the Office withdraw the rejection of Applicants' dependent claim 23 and earnestly solicit allowance of this claim.

***IV. The Office's Rejection under 35 U.S.C. § 103 Based on Marinelli in View of Heitzman, Pejas, and Boyd, and Further in View of Eden***

In the Office Action mailed March 2, 2009, the Office rejected claim 25 under 35 U.S.C. § 103 as allegedly being unpatentable over Marinelli in view of Heitzman, Pejas, and Boyd and further in view of Eden, et al., U.S. Patent No. 5,993,335 ("Eden"). Applicants respectfully traverse the rejection and request reconsideration of the claim, as amended.

As described above, Marinelli, Heitzman, Pejas, and Boyd do not recite the camera arrangement recited in Applicants' independent claim 21, as amended. Eden does not cure this deficiency and the Office does not rely on it to do so. Rather, Eden describes sporting event in a half-pipe area. Eden does not even mention a camera. Thus, Marinelli, in view of Heitzman, Pejas, and Boyd and further in view of Eden do not teach or suggest the camera arrangement, as recited in Applicants' independent claim 21 or its corresponding dependent claim 25. Applicants respectfully request that the Office withdraw the rejection of Applicants' dependent claim 25 and earnestly solicit allowance of this claim.

***V. The Office's Rejection under 35 U.S.C. § 103 Based on Marinelli in View of Heitzman and Pejas and Further in View of Shea***

In the Office Action mailed March 2, 2009, the Office rejected claim 26 under 35 U.S.C. § 103 as allegedly being unpatentable over Marinelli in view of Heitzman and Pejas and further in view of Shea, U.S. Patent No. 6,430,453 ("Shea"). Applicants respectfully traverse the rejection and request reconsideration of the claim, as amended.

As described above, Marinelli, Heitzman, and Pejas, do not recite the camera arrangement recited in Applicants' independent claim 21, as amended. Shea does not cure this deficiency and the Office does not rely on it to do so. Rather, Shea describes a bowling center system for bowlers at remote locations to join in the same game. Shea does not even mention a camera. Thus, Marinelli, in view of Heitzman and Pejas and further in view of Shea do not teach or suggest the camera arrangement, as recited in Applicants' independent claim 21 or its corresponding dependent claim 26. Applicants respectfully request that the Office withdraw the rejection of Applicants' dependent claim 26 and earnestly solicit allowance of this claim.

***VI. The Office's Rejection under 35 U.S.C. § 103 Based on Marinelli in View of Heitzman and Pejas and Further in View of Shea***

In the Office Action mailed March 2, 2009, the Office rejected claims 32-34 under 35 U.S.C. § 103 as allegedly being unpatentable over Marinelli in view of Heitzman and Pejas and further in view of Mickelson U.S. Patent No. 6,163,021 ("Mickelson"). Applicants respectfully traverse the rejection and request reconsideration of the claims, as amended.

As described above, Marinelli, Heitzman, and Pejas, do not recite the camera arrangement recited in Applicants' independent claim 21, as amended. Mickelson does not cure this deficiency and the Office does not rely on it to do so. Rather, Mickelson describes a navigation system for spinning projections. Mickelson does not even mention a camera. Thus, Marinelli, in view of Heitzman and Pejas and further in view of Mickelson do not teach or suggest the camera arrangement, as recited in Applicants' independent claim 21 or its corresponding dependent claims 32-34. Applicants respectfully request that the Office withdraw the rejection of Applicants' dependent claims 32-34 and earnestly solicit allowance of these claims.

***VII. Conclusion***

If the Examiner believes that a telephone conference or a personal interview will be useful to advance the prosecution of this application and/or to place the application in condition for allowance, he is invited to contact the undersigned attorney.

All rejections having been addressed, Applicants respectfully submit that this application is in condition for allowance. Allowance of this application is earnestly solicited.

Respectfully submitted,

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